

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

BODYGUARD PRODUCTIONS,
INC., et al.,

Plaintiffs,

vs.

RCN TELECOM SERVICES OF
MASSACHUSETTS, LLC and RCN
TELECOM SERVICES, LLC,

Defendants.

No. 3:21-cv-15310-GC-TJB

**[PROPOSED] ORDER FOR *PRO*
HAC VICE ADMISSION OF
KYLE G. GOTTUSO**

THIS MATTER having been brought before the Court by Edward F. Behm, Esquire, attorney for Defendants, RCN Telecom Services of Massachusetts, LLC and RCN Telecom Services, LLC (collectively, “RCN Defendants”) for an Order allowing Kyle G. Gottuso, Esquire, to appear and participate *pro hac vice*, and the Court having considered the supporting papers, and for good cause shown pursuant to Fed.R.Civ.P. 78 and L.Civ. R. 101.1, in the United States District Court for the District of New Jersey; **IT IS**, on this ____ day of _____, 2021, hereby **ORDERED** that Kyle G. Gottuso, Esquire, a member of the Bar of the State of Missouri, shall be and hereby is permitted to appear *pro hac vice* for the purpose of representing the RCN Defendants in this matter pursuant to Local Civil Rule 101.1, United States District Court for the District of New Jersey; and

IT IS FURTHER ORDERED that Edward F. Behm, Esquire, shall continue to represent the RCN Defendants as counsel of record in this matter and shall be responsible for the conduct of the attorney admitted hereby; and

IT IS FURTHER ORDERED that Kyle G. Gottuso, Esquire, shall make payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Rule 1:28-2(a) for each year in which such attorney continues to represent the Defendant; and

IT IS FURTHER ORDERED that the Clerk of the Court shall forward a copy of this Order to the Treasurer of the Fund; and

IT IS FURTHER ORDERED that Kyle G. Gottuso, Esquire, shall be deemed to have agreed to take no fee in any tort case in excess of the New Jersey State Court Contingency Fee Rule, New Jersey Rule R. 1:21-7, as amended; and

IT IS FURTHER ORDERED that Kyle G. Gottuso, Esquire, shall be bound by the Local Civil Rules and Admiralty Rules of the United States District Court for the District of New Jersey, including, but not limited to the provisions of L. Civ. R. 103.1, *Judicial Ethics and Professional Responsibility*, L. Civ. R. 104.1, *Discipline of Attorneys*; and

IT IS FURTHER ORDERED that Kyle G. Gottuso shall remit a payment of \$150.00, payable to the Clerk, United States District Court for the District of New Jersey, pursuant to L. Civ. R. 101.1(c)(3).

Tonianne J. Bongiovanni, U.S.M.J.